

**UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF MICHIGAN
SOUTHERN DIVISION**

UNITED STATES OF AMERICA,

Plaintiff,

v.

**D-1 JERRY LATIMORE, and
D-2 LUTHER GILFORD**

Defendants.

**Case:2:08-cr-20633
Judge: Duggan, Patrick J
MJ: Pepe, Steven D
Filed: 12-02-2008 At 04:14 PM
INDI USA V LATIMORE, ET AL (DAT)**

INDICTMENT

THE GRAND JURY CHARGES:

COUNT ONE

**(18 U.S.C. §§ 1832(a)(1), (a)(2), (a)(3), (a)(4) and 2 -THEFT OF TRADE SECRETS;
AIDING AND ABETTING)**

That from in or about October 2003 until on or about December 23, 2003, in the Eastern District of Michigan, Southern Division, and elsewhere, defendants **JERRY LATIMORE** and **LUTHER GILFORD**, did knowingly and intentionally, with the intent to convert information that included a trade secret, that is, a set of confidential documents containing costs and supplier strategies belonging to Visteon, Incorporated, which were related to products produced for interstate and foreign commerce, to the economic benefit of a person other than the owner thereof, and intending and knowing that the offense would injure the owner of the trade secret:

(a) steal, or without authorization appropriate, take, and carry away such information,

- in violation of Title 18, United States Code, Section 1832(a)(1);
- (b) copy and duplicate such information without authorization, in violation of Title 18, United States Code 1832(a)(2);
 - (c) receive and possess such trade secrets knowing the same to have been stolen, appropriated, and converted without authorization, in violation of Title 18, United States Code 1832(a)(3); and,
 - (d) aid and abet each other and attempt to do all of the above, in violation of Title 18, United States Code 1832(a)(4).

All in violation of Title 18, United States Code 1832(a)(1-4) and 2.

THIS IS A TRUE BILL.

s/GRAND JURY FOREPERSON

GRAND JURY FOREPERSON

Dated:

TERRENCE BERG
Acting United States Attorney

s/SHELDON N. LIGHT
Assistant U.S. Attorney
Chief, Economic Crimes Unit

s/GRAHAM L. TEALL

Assistant U.S. Attorney
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Bar No. P40645

Dated: December 2, 2008

United States District Court
Eastern District of Michigan

Criminal Case C

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NOTE: It is the responsibility of the Assistant U.S. Attorney signing this form to con

Companion Case Information	Companion Case Number:
This may be a companion case based upon LCrR 57.10 (b)(4) ¹ :	Judge Assigned:
[] Yes [X] No	AUSA's Initials:

Case Title: UNITED STATES ATTORNEY v. D-1 Jerry Latimore and
D-2 Luther Gilford

County where offense occurred : Wayne

Check One: [X] Felony [] Misdemeanor [] Petty

- [] Indictment /Information no prior complaint.
 [] Indictment X /Information based upon prior complaint [Case number: 03-81138 & 03-81139]
 [] Indictment /Information based upon LCrR 57.10 (d) [Complete Superseding section below].

Superseding Case Information:

Superseding to Case No: Judge:

- [] Original case was terminated; no additional charges or defendants.
 [] Corrects errors; no additional charges or defendants.
 [] Involves, for plea purposes, different charges or adds counts.
 [] Embraces same subject matter but adds the defendants and charges below:

Defendant name

Charges

December 2, 2008

Date

Graham L. Teall
Assistant United States Attorney

(313) 226-9118

Phone Number

¹ Companion cases are matters in which it appears that substantially similar evidence will be offered at trial or the same of related parties are present, and the cases arise out of the same transaction or occurrence. Cases may be companion cases even though one of them may have already been terminated. 5/1/99